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October 17, 2024

VIA ECF

Hon. André M. Espinosa, U.S.M.J.
U.S. District Court of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Airtech International Inc. v. Yim, et al.; Case 2:22-cv-00668-MEF-AME

Dear Judge Espinosa:

The parties write jointly pursuant to the Order (D.E. 265) directing the parties to submit by October 17, 2024 a joint status letter updating the Court on the scope of any remaining discovery and providing a proposed schedule for that discovery. This joint letter updates and supplements the joint letter dated September 17, 2024 (D.E. 264) and reference is made thereto. This joint letter also proposes an amended discovery schedule as agreed and ordered.

I. Plaintiff's Update

A. Party Discovery

1. Document Production

a. Previous Requests – Deficiencies and Incomplete Productions

Gmail Production

On September 19, 2024, Defendants produced over 155,000 pages of documents from the third discovered Gmail account, airtechuscom@gmail.com. As previously reported, Airtech has been reviewing the production. Due to the large volume of documents produced, it currently expects to complete its review no sooner than the end of this month. Rather than defer proposing a schedule any further, Airtech has incorporated into the jointly proposed schedule below its best estimate of the time that will be needed complete the review among the other tasks scheduled.

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II. Defendants' Update

Defendants have no update from the positions set forth in their portion of the September 17, 2024 joint status letter to Court (D.E. 264) other than to confirm that Defendant Byungchan Yim is prepared to certify that the production of emails collected from his personal Gmail accounts has been completed. Defendants consent to the deadlines set forth in the below jointly proposed discovery schedule.

III. Jointly Proposed Amended Discovery Schedule

EVENT	DATE
Date by which Defendants will produce documents from Gmail account airtechuscom@gmail.com	Completed
Letters to be exchanged by this date setting forth all additional sources of files to be collected and searched for responsiveness to all prior document requests.	November 15, 2024
Date by which the parties will respond to the document source letters identifying sources of collection and production not yet collected, searched, and produced.	November 22, 2024
Letters to be exchanged by this date setting forth all open deficiencies to be corrected in responses to written party discovery requests served before the date of this Order.	November 27, 2024
Date by which the parties will serve a written response to the discovery response and production deficiency letter.	December 16, 2024
Last day for written party discovery requests.	December 24, 2024
Letters proposing agreements regarding non-party discovery to be exchanged by this date.	January 7, 2025
Last day to serve subpoenas.	January 14, 2025 ¹
Party document production to be substantially complete.	February 24, 2025
Interim Joint Status Report due.	February 28, 2025

¹ This deadline does not apply to discovery of non-party witnesses located outside the United States. To the extent such discovery is available in the Republic of Korea pursuant to the Hague Evidence Convention, the processing of Letters of Request and conduct of any authorized discovery will take at least three months and more likely six months to a year.

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Parties to notice all continuation and new party depositions.	March 3, 2025
Parties to agree on deposition schedule and file joint letter regarding any dispute over party deposition schedule.	March 7, 2025
First day party depositions can be conducted.	March 10, 2025
Last day party depositions can be conducted.	April 11, 2025
Close of fact discovery.	April 18, 2025 ¹
Initial expert reports due on issues for which a party bears the burden.	May 20, 2025
Initial expert reports due on issues for which a party does not bear the burden	June 3, 2025
Opposing expert reports to those for which a party has the burden	June 20, 2025
Opposing expert reports to those for which a party does not have the burden	July 3, 2025
Rebuttal/responsive expert reports to opposing reports to those for which a party has the burden.	June 20, 2025
Rebuttal/responsive expert reports to opposing reports to those for which a party does not have the burden.	July 17, 2025
Expert discovery deadline and close of all discovery.	July 18, 2025 ¹

Respectfully submitted,

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Semaya Law Firm
Co-counsel appearing *Pro Hac Vice***BRACH EICHLER LLC**By: /s/Thomas Kamvosoulis
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